

IN THE
UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION

UNITED STATES OF AMERICA	:	
	:	
v.	:	Criminal No. 3:18-CR-00025
	:	
COLE EVAN WHITE	:	

UNITED STATES' MOTION FOR DOWNWARD DEPARTURE

COMES NOW the United States of America, and respectfully moves this Court to sentence the defendant, Cole Evan White, pursuant to Federal Sentencing Guidelines section 5K1.1 and Title 18, United States Code, Section 3553(e), based upon the substantial assistance he provided to law enforcement authorities.

THEREFORE, the United States moves the Court to depart downward from the defendant's Federal Sentencing Guidelines sentence level.

Respectfully submitted,

DANIEL P. BUBAR
Acting United States Attorney

/s/Chris Kavanaugh
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CERTIFICATE OF SERVICE

I hereby certify that on October 14, 2020, I electronically filed the forgoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to defense counsel.

/s/Chris Kavanaugh
Chris Kavanaugh
Assistant United States Attorney